

Privacy Notice for Shareholders

Introduction and contact information

We are committed to protecting the privacy and security of your personal data. This privacy notice explains how we collect and use personal data about you during and after the period in which you hold ZIGUP Plc shares, in accordance with the data protection legislation, and applies to our current and former shareholders and individuals who are representatives of our shareholders. This privacy notice does not form part of any contract relating to the shares you hold.

This privacy notice extends to the share registry services which are carried out by MUFG Corporate Markets (MUFG) on our behalf. We have appointed MUFG under the rules of the Companies Act to manage our register of shareholders. MUFG's role as registrar includes keeping an up-to-date record of shares held by shareholders, administration of dividends, managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, MUFG process personal data about you as a shareholder on our behalf.

It is important you read this notice, so you understand how and why we are using your personal data and your rights under the data protection legislation. We may update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal data.

References to "we", "us" or "our" are to ZIGUP Plc, (a company incorporated in England and Wales with registered number 00053171 with the registered office address at Northgate Centre, Lingfield Way, Darlington, England, DL1 4PZ). If you have any questions in relation to this privacy notice, or wish to exercise your data protection rights, please contact our DPO via this email address dpo@zigup.com

The personal data we collect

We collect personal data when you supply information to us, either directly or via your agent, stockbroker or share plan administrator, including:-

- your name and contact details,
- categories and classes of shares and equity awards held,
- information you share with us in communications,
- your bank or building society account details where you provide these for dividend payments,
- tax ID and tax residency information,
- details of third party brokers (where relevant),
- any other data needed to complete any shared based transactions on your behalf.
- We may use cookies and similar technologies on our website. You will find more information in our website privacy and cookie policy.

We use your personal data to:-

- Manage your shareholder investment.

- Maintain an up-to-date shareholder register.
- Enable you to exercise your rights as a shareholder.
- Contact you with shareholder information including dividend payments, shareholder resolutions, reports and meetings and to respond to your communications.
- Meet our responsibilities to our regulators, tax officials, law enforcement agencies.

Artificial Intelligence (AI)

We use AI tools to support internal business process and to improve productivity. In certain circumstances your personal data may be processed through these tools. Only company approved AI tools are permitted for use within the business which are appropriately tested and subject to security measures. Our default position is that outputs of AI tools are reviewed and validated by human oversight.

Data sharing

Where necessary, we share personal data with trusted third parties who work with us to deliver our services, including:-

- MUFG to manage our record of shareholders.
- J.P. Morgan Workplace Solutions (formerly known as Global Shares) act as our share plan administrators and provide services including the provision of the online portal (Your Share Hub), service desk (including the telephone helpline) and management of the award registers of entitlements, award information and transactions.
- Other members of the ZIGUP Group of companies where necessary, including ZIGUP Corporate Services Limited which provides a range of operational support services to our Group.
- Software providers.
- There may be occasions when we must share information (including with regulators) about you so that we comply with a legal obligation. We may also exchange information with other companies and organisations for the purposes of verifying shareholdings, establishing your identity, fraud protection, crime prevention or detection and credit (and other) risk reduction.
- Professional advisers including legal advisers, auditors, tax advisers.
- Regulators, governmental authorities, stock exchanges, HMRC, Companies House, Financial Conduct Authority and law enforcement bodies.
- Banks, and financial institutions to facilitate dividend payments and other financial transactions.
- Third parties in connection with corporate transactions such as mergers, acquisitions, investments or restructuring

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We have contracts in place with our third-party data

processors which means that they are only permitted to process your personal data for specified purposes and in accordance with our instructions.

Automated decision making

We do not currently make decisions about you by solely automated means.

Where we store your personal information

All information you provide to us is stored securely. Where we have given you, or where you have chosen a password which enables you to access certain parts of our systems, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to protect it from unauthorised access.

Retaining your information

We retain personal data for as long as necessary to comply with applicable legal, regulatory, tax, accounting and audit requirements, to establish exercise and defend legal claims; to fulfil contractual and operational obligations; and in accordance with our internal data retention timescales.

International data transfers

We do not generally process personal information outside of the UK or the European Economic Area but should this occur from time to time (for example certain service providers may process personal data outside the UK or EEA), it will be done only in a way that complies with current laws and regulations and any such transfers are subject to data safeguards.

Your legal rights

Access to information

You can request access to your personal data (commonly known as a “data subject access request” or “subject access request”) using the contact details provided. Subject to compliance with any laws and regulations, this enables you to receive a copy of your personal data together with other supplementary information. There are some exceptions which means that you might not always receive all the information we process.

Your other rights

In addition to having access to your personal data (see above), you have the right to:-

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in certain circumstances.
- Request the transfer of your personal data to you or to a third party. This only applies to information you have given us.

The above rights are not all absolute and whether you can use one of these rights may depend on the way we obtained your information or the legal basis on which we use your personal information.

If you wish to exercise any of the rights set out above, please contact us at dpo@zigup.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Your right to complain

If you wish to raise a complaint about how we have handled your personal data or dealt with your data protection rights, you can complain to us by:-



- Completing our data protection complaint form available on our website [here](#) which you can submit by email to dpo@zigup.com or by post.
- Emailing us at dpo@zigup.com
- Writing to us at Northgate Centre, Lingfield Way, Darlington, DL1 4PZ, marked FOR THE ATTENTION OF THE DPO.

We will acknowledge all complaints within 30 days from receipt. We may need to contact you to verify your identity or to request further information from you.

If, after receiving our outcome response, you are still unhappy with how we have handled your personal data, you have the right to raise your concern with the Information Commission who can be contacted:

Online at <https://ico.org.uk>

By telephone 0303 1231113

Postal address: Information Commission, Wycliffe House, Wilmslow, Cheshire, SK9 5AF